To Whom It May Concern 8 Apr 2025

SUBJECT: Part 15 Amendment for AM (47 CFR Part 15.209) and FM (47 CFR Sect 15.239)

Per Public Notice GN Docket No. 25-133, I would like to request an amendment or possibly an update to the Part 15 CFR for AM and FM broadcasting.

There is a great understanding and concern with the multitude of frequencies and use of those frequencies within the nation's airwaves. Further, it is clear that interfering frequencies can lead to challenges if not safety concerns when crossing into a paid or licensed frequency.

Nonetheless, there are many communities, specifically in rural or sparsely populated areas where important news, weather, and emergency broadcast is necessary to ensure the safety and well-being of the people.

In recent years, a growing interest in what is called hobby or Part 15 broadcasting has increased to provide communities with the mindset of delivering news, information, and weather coupled with traditional broadcast programming (e.g. news/talk/sports, music, etc).

The current code limits the FM Part 15 broadcaster to 250 microvolts per meter at 3 meters which equates to approximately a 200 foot radius of transmission in optimum conditions. Equally, the AM Part 15 broadcaster is permitted a little more transmission range as the total input power to the final radio frequency stage cannot exceed 100 milliwatts. In addition to this, there is a total length of the transmission line, antenna, and ground lead not greater than 3 meters. While specific, the AM Part 15 broadcaster is able to achieve broadcast ranges of up to 5 miles in optimum conditions.

There are also additional codes for college or campus stations as well as carrier current, sideband, and other variations and codes within the CFR 47 Part 15.

My request here is can we simply the AM and FM part 15 codes while allowing FM to have the same range equivalency as the AM part 15?

While the FCC, in many instances, needs to be specific to ensure non-interference with licensed operations and frequency especially for safety reasons (e.g. aircraft, emergency response, etc), can there be a change or update to these regulations so that the Part 15 broadcaster can be a broadcaster to the community that they serve to deliver important news, weather, and emergency broadcast much like the licensed broadcast entity.

My proposed changes would be as follows:

(1) Part 15.XXX:

For AM broadcast (frequency band 510-1705 kHz):

(a) The total input power to the final radio frequency stage (exclusive of filament or heater power) shall not exceed 100 milliwatts.

(b) The total length of the transmission line, antenna and ground lead (if used) shall not exceed 3 meters.

(c) All emissions below 510 kHz or above 1705 kHz shall be attenuated at least 20 dB below the level of the unmodulated carrier. Determination of compliance with the 20 dB attenuation specification may be based on measurements at the intentional radiator's antenna output terminal unless the intentional radiator uses a permanently attached antenna, in which case compliance shall be demonstrated by measuring the radiated emissions.

For FM broadcast (frequency band 88 – 108 MHz):

(a) The total input power to the final radio frequency stage (exclusive of filament or heater power) shall not exceed 100 milliwatts.

(b) The total length of the transmission line, antenna and ground lead (if used) shall not exceed 3 meters.

(c) All emissions below 88 MHz or above 108 MHz shall be attenuated at least 20 dB below the level of the unmodulated carrier. Determination of compliance with the 20 dB attenuation specification may be based on measurements at the intentional radiator's antenna output terminal unless the intentional radiator uses a permanently attached antenna, in which case compliance shall be demonstrated by measuring the radiated emissions.

OR (2): Another suggestion would be to create a Sub-Low Power AM and FM (SLPAM) or (SLPFM) license that is attainable for those that would like to affordably broadcast to their community while not having to be subjected to the excessive filing fees that regular licensed stations incur.

For instance, a SLPAM or SLPFM is required to file for a license of $99. No construction permit necessary. Simply, a frequency engineer to verify a specific frequency is indeed free and available without interference. Then, provide an annual form stating that the frequency (station) remains or is active. No late fees, no public file late fees, or excessive fines for the license holder should be administered. If, however, the annual form is not received by the due date, the license holder forfeits their license and another entity/individual can request that now vacant frequency.

In either proposal, there are great benefits to having a broadcaster utilizing the Part 15 leniency as we are not trying to be radical or rebellious, as depicted with “Pirate Radio.” Instead, the broadcaster is exercising their freedom of speech while equally providing a

service (the original intended use of broadcast radio and television) to deliver important news, weather, and emergency broadcast to the listener.

Thank you for your time and consideration.